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December 23, 1998

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Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, DC 20554

RE: Ex Parte Presentation ET Docket No. 98-42

Dear Ms. Salas:

This letter is written on behalf of L/Q Licensee, Inc. ("LQL"), Globalstar, L.P., and AirTouch Communications, Inc., in response to recent ex parte filings regarding in-band emissions limits for radiofrequency ("RF") lighting devices operating under Part 18 of the Commission's Rules. LQL, Globalstar, and AirTouch have an interest in this proceeding through their respective interests in the Globalstar™ Mobile-Satellite Service system. The Globalstar system operates with space-to-earth user links in the 2483.5-2500 MHz band, and, in this proceeding, the Commission has proposed rules to govern RF lighting devices operating pursuant to Part 18 in the 2400-2500 MHz band.

In their "Joint Reply Comments" filed in this proceeding on August 24, 1998, LQL, Globalstar and AirTouch pointed out that the RF lighting devices developed by Fusion Lighting, if permitted to operate as proposed, would likely cause significant signal degradation to a user terminal operated with the Globalstar™ satellite system within a relatively large area near the lamp. Accordingly, LQL, Globalstar and AirTouch urged the Commission to adopt in-band emissions limits for RF lighting devices in the 2400-2500 MHz band, and to require the use of a high pass filter on RF lamps to reduce microwave energy output.

On December 1, 1998, an ex parte letter was filed on behalf of the Bluetooth Promoters, Harris Corporation, Metricom, Symbol Technologies, and 3Com Corporation, proposing the following amendments to Section 18.305(c) of the Commission's Rules:

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List A B C D E

§ 18.305 Field Strength Limits

(a) Except as otherwise provided, ISM equipment operating on a frequency specified in § 18.301 is permitted unlimited radiated energy in the band specified for that frequency.

....

[ReNUMBER § 18.305(c) as § 18.305(c)(1) and add this new § 18.305(c)(2)]

(2) Within the bands specified in § 15.247, the field strength limits for RF lighting devices, measured at 3 meters, shall not exceed 1 mV/m for equipment installed indoors, and 10 mV/m for equipment installed outdoors.

See Letter from Mitchell Lazarus to Magalie Roman Salas (dated Dec. 1, 1998).

These amendments were proposed to protect Part 15 devices from harmful interference caused by in-band emissions from RF lighting devices. According to the filing parties, the proposed amendments were designed to allow the Commission to protect "the public interest in Part 15 spread spectrum operations, and to set in-band emissions limits compatible with the successful operation of both Part 15 and RF lighting." Id.

Globalstar agrees with the Bluetooth Promoters et al. concerning the rule change contained in their December letter with the following modifications:

- 1) the applicable frequency range for this proposed rule should extend up to 2500 MHz;
- 2) the field strength limit should be the same for indoor and outdoor devices, i.e., 1 mV/m at 3 meters.

The field strength limit proposed by the Bluetooth Promoters et al. for indoor devices is equivalent to the limit discussed in the "Joint Reply Comments" of LQL, Globalstar, and AirTouch (Technical Comments, at ¶ 7). As pointed out in those Technical Comments, the adoption of a field strength limit of 100 mV/m at 30 meters would allow Globalstar user terminals to be within six (6) meters of an RF lighting device without experiencing call interruption.

The Bluetooth Promoters' letter, like the Joint Reply Comments, points out that RF lighting devices do not depend for their operation on emissions beyond the confines of the device and that inexpensive and effective shielding measures can limit microwave emissions while not significantly affecting visible light output. Therefore, inexpensive shielding measures would provide additional, cost-effective protection for both Part 15 devices and MSS Above 1 GHz user terminals.

LQL, Globalstar and AirTouch support the proposals of the Bluetooth Promoters, et al., as modified above. For the public interest reasons detailed in their "Joint Reply Comments," they recommend that the Commission adopt such rules to protect the communications services provided by MSS Above 1 GHz satellite systems from harmful in-band emissions caused by RF lighting devices.

Pursuant to Section 1.1206 of the Commission's Rules, two copies of this written ex parte presentation are being submitted for inclusion in the above-referenced docket.

Respectfully submitted,

AIRTOUCH COMMUNICATIONS, INC.

L/Q LICENSEE, INC.
GLOBALSTAR, L.P.

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CERTIFICATE OF SERVICE

I, William D. Wallace, hereby certify that I have on this 23rd day of December, 1998, caused to be served true and correct copies of the foregoing letter upon the following parties via hand delivery:

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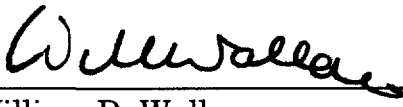
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